

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:18CR00975CDP
)	
RANDY HAYS,)	
)	
Defendant.)	

**DEFENDANT’S MOTION TO TRAVEL OUTSIDE
THE EASTERN DISTRICT OF MISSOURI**

COMES NOW Defendant Randy Hays, by and through his attorney Gregory N. Smith, and in support of said motion states as follows:

1. That Defendant’s grandmother passed away on October 24, 2019 after a long illness.

2. That the funeral for Defendant’s grandmother is scheduled for Sunday October 27th in Corning, Arkansas. The information for the funeral home is as follows:

Ermert Funeral Home
1000 W. Elm Street
Corning, AR 72422
(870) 857-3596

3. That the Defendant is requesting to travel to Corning, AR to attend his grandmother’s funeral. Defendant will drive his vehicle and plans to leave his residence at 8:00 a.m. on October 27th. Defendant will return to his residence at 8:00 p.m. that same day.

4. That counsel for the Defendant has spoken with AUSA Carrie Costantin and she has no objection to this request.

5. That Defendant will abide by any and all rules and restrictions placed on him by the U.S. Pretrial Services Office.

Respectfully submitted,

/s/ Gregory N. Smith
GREGORY N. SMITH #58482MO
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(314) 721-6677 (314) 721-1710 FAX

CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2019, I filed the foregoing in the above mentioned action with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following: Jennifer Winfield, Assistant United States Attorney.

/s/ Gregory N. Smith